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Superintendent of Building Maintenance
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Director of Inspection Services
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Director, Public Safety Communications
Eric M. Linsley

MOBILE COUNTY PUBLIC WORKS

Director of Public Works / County Engineer
Joe W. Ruffer, P.E.

January 13, 2010

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No 10-2
DA-10-6

Subject: Comment on Request by ShipCom, LLC for
Waiver of Part 80.123 Rules to Provide HF
Communications to First Responders

Gentlemen,

ShipCom has requested the FCC to grant a waiver of the rules under Part 80 to allow certain public safety based fixed and mobile facilities access use of High Frequency (HF) radio frequencies currently supportive of maritime operations. ShipCom operates a public shore radio station that maintains a 24-hour manned watch of its licensed radio channels and provides the maritime community with various services. ShipCom (WLO in Mobile, AL) has in the past and continues to be, a vital partner in our Mission Critical Public Safety Interoperability Communications Plan for the entire Gulf Coast Region.

By leveraging the propagation characteristics of their HF communications equipment, ShipCom has the ability to communicate to all Federal, State and Local Emergency Management Agencies. This is a particular interest to mission critical public safety interoperable communications. As we have learned, normal wired/wireless communications are disrupted immediately following a catastrophic event. HF communications can be set up independently of fixed signal repeater stations or radio antenna tower structures and is an essential part in supporting long-range mission critical public safety communications to other areas in the state or region.

As communication managers continue to expand their interoperability communications assets by purchasing HF transceivers, the need for training and/or initiating a common radio check becomes an important role. By ensuring capable personnel is adequately trained, and that the HF

equipment is operational, ShipCom's operators can work with those interested public safety uses in ensuring that the users are familiar with how to operate the equipment and that the equipment is working properly.

Granting the wavier will in no way adversely effect the maritime services. It will enhance public safety interoperable communications nationwide.

Thank you



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cc Joe Ruffer, P.E.
County Engineer